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*Attorneys for Irving H. Picard, Trustee of the  
Substantively Consolidated SIPA Liquidation of  
the estate of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

**AMENDED COMPLAINT**

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee of the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

AMERICAN SECURITIES MANAGEMENT, L.P.,  
formerly known as AMERICAN SECURITIES, L.P.;  
PJ ASSOCIATES GROUP, L.P., doing business as PJ  
ADMINISTRATOR, L.L.C.;  
PJ ASSOCIATES GROUP GP CORP.;  
PJ ADMINISTRATOR, L.L.C., formerly known as PJ

Adv. Pro. No. 10-05415 (SMB)

ASSOCIATES GROUP, L.P.;  
AMERICAN SECURITIES OPPORTUNITY FUND,  
L.P.;  
AMERICAN SECURITIES HOLDINGS  
CORPORATION;  
AMERICAN SECURITIES GROUP, L.L.C.;  
AS HIROTA HOLDINGS CORP.;  
CHARLES D. KLEIN, individually, as beneficial  
owner of one or more IRAs, as custodian and/or trustee  
of the Charles D. Klein Money Purchase Pension Plan,  
as beneficiary of the Charles D. Klein Generation  
Skipping Trust DTD 7/31/01, as custodian and/or  
trustee of the Jane P. & Charles D. Klein Foundation  
and as custodian and/or trustee of The Charles and Jane  
Klein Family Fund;  
DAVID P. STEINMANN, individually, as beneficial  
owner of one or more IRAs, as custodian and/or trustee  
of the David P. Steinmann Money Purchase Pension  
Plan, as trustee of the Trust UAD 3/4/92 FBO  
Benjamin R. Sigelman, as trustee of the Trust UAD  
3/4/92 FBO Jonathan R. Sigelman and as custodian for  
Catherine L. Steinmann;  
NEIL B. GOLDSTEIN, individually, as beneficial  
owner of one or more IRAs, as grantor of the Neil B.  
Goldstein 2007 Trust and as beneficiary of the Jean  
Weiner 1991 Grantor Retained Annuity Trust;  
WALLACE APTMAN, individually and as beneficial  
owner of one or more IRAs;  
ABE MASTBAUM, individually, as custodian for  
Jason Mastbaum and as beneficial owner of one or  
more IRAs;  
MICHAEL G. FISCH, individually, as beneficial owner  
of one or more IRAs, as custodian and/or trustee of the  
Michael G. Fisch Profit Sharing Plan and as trustee of  
the Michael G. Fisch 2006 Revocable Trust;  
JOSEPH J. NICHOLSON, individually and as trustee  
of the Joseph J. Nicholson Charitable Remainder  
Unitrust;  
ELIZABETH R. VARET, individually, as custodian for  
Joseph R. Varet, as custodian and/or trustee of the  
Elizabeth R. Varet Money Purchase Pension Plan, as  
grantor of the 2004 V Trust, as trustee and beneficiary  
of the Apollo Trust for Elizabeth R. Varet UAD  
2/10/69, as trustee of the Apollo Trust 2/10/69 FBO  
Nina Rosenwald, as settlor of the Michael A. Varet  
Trust UAD 11/9/94, as settlor of the Trust 11/9/94 (A.  
Anagnos et al., trustees), as trustee of Issue 1 Trust

UAD 8/30/41 FBO Nina Rosenwald, as trustee of Issue 1 Trust UAD 8/30/41 FBO Alice Rosenwald, as trustee and beneficiary of Issue 1 Trust UAD 8/30/41 FBO Elizabeth R. Varet, as trustee of Issue Trust 5 UAD 9/28/51 FBO Nina Rosenwald, as trustee of Issue Trust 5 UAD 9/28/51 FBO Alice Rosenwald, as trustee of Issue Trust 5 UAD 9/28/51 FBO Benjamin R. Sigelman, as trustee of Issue Trust 5 UAD 9/28/51 FBO Jonathan R. Sigelman, as trustee of Issue Trust 5 UAD 9/28/51 FBO David R. Varet, as beneficiary and trustee of Issue Trust 5 UAD 9/28/51 FBO Elizabeth R. Varet, as trustee of Issue Trust 5 UAD 9/28/51 FBO Joseph R. Varet, as trustee and beneficiary of Issue Trust 6 UAD 8/13/65 FBO Elizabeth R. Varet, as trustee of Issue Trust 6 UAD 8/13/65 FBO Alice Rosenwald, as trustee of Issue Trust 6 UAD 8/13/65 FBO Nina Rosenwald, as trustee of the Trust UAD 3/4/92 FBO Benjamin R. Sigelman and as trustee of the Trust UAD 3/4/92 FBO Jonathan R. Sigelman;  
LAURENCE ACH, as trustee of the Jean Weiner 1991 Grantor Retained Annuity Trust;

ALEXANDER G. ANAGNOS, as trustee of the 2004 V Trust and as trustee of Trust 11/9/94 (A. Anagnos et al., trustees);

GEORGE ANAGNOS;

JOSEPHINE G. ANAGNOS;

STEVEN ANAGNOS;

MARIA ANAGNOS-PIERCE;

BELINDA CLARKE, as trustee for the Concorde 1987 Trust DTD 12/9/87;

STUART H. COLEMAN, as trustee of the Apollo Trust for Elizabeth R. Varet UAD 2/10/69, as trustee of the Apollo Trust 2/10/69 FBO Nina Rosenwald, as trustee of Issue 1 Trust UAD 8/30/41 FBO Nina Rosenwald, as trustee of Issue 1 Trust UAD 8/30/41 FBO Elizabeth R. Varet, as trustee of Issue 1 Trust UAD 8/30/41 FBO Alice Rosenwald, as trustee of Issue Trust 5 UAD 9/28/51 FBO Alice Rosenwald, as trustee of Issue Trust 5 UAD 9/28/51 FBO Nina Rosenwald, as trustee of Issue Trust 5 UAD 9/28/51 FBO Benjamin R.

Sigelman, as trustee of Issue Trust 5 UAD 9/28/51 FBO Jonathan R. Sigelman, as trustee of Issue Trust 5 UAD 9/28/51 FBO David R. Varet, as trustee of Issue Trust 5 UAD 9/28/51 FBO Elizabeth R. Varet, as trustee of Issue Trust 6 UAD 8/13/65 FBO Elizabeth R. Varet, as trustee of Issue Trust 6 UAD 8/13/65 FBO Alice Rosenwald and as trustee of Issue Trust 6 UAD 8/13/65 FBO Nina Rosenwald;

JOYCE W. GOLDSTEIN, individually, as beneficial owner of an IRA and as trustee of the Neil B. Goldstein 2007 Trust;

ELLEN V. GREENSPAN, as trustee of the Trust 11/9/94 (A. Anagnos et al., trustees);

ANTHONY R. GRILLO, as trustee of the Joseph J. Nicholson Charitable Remainder Unitrust;

LAILA HAFNER, as beneficial owner of an IRA;

NAN M. HARMAN, as trustee of the Visalia Trust UAD 1/25/97;

REED L. HARMAN, as trustee of the Visalia Trust UAD 1/25/97;

ANDREW B. KLEIN, individually, as beneficial owner of one or more IRAs, as trustee and beneficiary of the Charles D. Klein Generation Skipping Trust DTD 7/31/01, as trustee of the Andrew Klein Trust DTD 12/27/97, as trustee of the Elizabeth Klein Trust DTD 12/27/97 and as grantor and trustee of the Andrew B. Klein 1997 Trust DTD 5/15/97;

ELIZABETH KLEIN, individually, as trustee and beneficiary of the Charles D. Klein Generation Skipping Trust DTD 7/31/01 and as trustee and beneficiary of the Elizabeth Klein Trust DTD 12/27/97;

JANE P. KLEIN, individually, as beneficial owner of an IRA, as custodian for Andrew B. Klein and Elizabeth Klein, as trustee of the Trust under will of Donald W. Parsons FBO Jane P. Klein, as trustee of the Elizabeth Klein Trust DTD 12/27/97, as trustee of the Charles D. Klein Generation Skipping Trust DTD 7/31/01 and as trustee of the Andrew Klein 1997 Trust

DTD 5/15/97;

JUDY STEINBERG KOVLER;

JAMES R. LEDLEY, as trustee of Issue Trust 5 UAD 9/28/51 FBO Jonathan R. Sigelman and as trustee of the Trust UAD 3/4/92 FBO Jonathan R. Sigelman;

BARRY F. MARGOLIUS, as trustee of the Joseph J. Nicholson Charitable Remainder Unitrust;

JASON MASTBAUM;

PAMELA MURPHY;

PAUL ROBERT MURPHY;

BENJAMIN E. NICKOLL, as trustee of the Charles D. Klein Generation Skipping Trust DTD 7/31/01;

THE ESTATE OF MIRIAM FURST-OSTOW;

RACHEL OSTOW LUSTBADER, as Executrix of the Estate of Miriam Furst-Ostow;

PETER PEARMAN, as trustee for the Concorde 1987 Trust DTD 12/9/87;

ARLENE MARIE PETTINGILL;

LAURA M. ROBERSON-FISCH, as beneficial owner of an IRA, as participant in the Laura M. Roberson-Fisch Money Purchase Pension Plan and as a participant in the Laura M. Roberson-Fisch Profit Sharing Plan;

ALICE ROSENWALD, also known as ALICE R. SIGELMAN, individually, as custodian for Jonathan Sigelman, as custodian for Benjamin R. Sigelman, as trustee and beneficiary of Issue 1 Trust UAD 8/30/41 FBO Alice Rosenwald, as trustee and beneficiary of Issue Trust 6 UAD 8/13/65 FBO Alice Rosenwald, as trustee of the Apollo Trust for Elizabeth R. Varet UAD 2/10/69, as trustee of the Apollo Trust 2/10/69 FBO Nina Rosenwald, as trustee of Issue 1 Trust UAD 8/30/41 FBO Nina Rosenwald, as trustee of Issue 1 Trust UAD 8/30/41 FBO Elizabeth R. Varet, as trustee

of Issue Trust 5 UAD 9/28/51 FBO Jonathan R. Sigelman, as trustee of Issue Trust 5 UAD 9/28/51 FBO David R. Varet, as trustee of Issue Trust 5 UAD 9/28/51 FBO Elizabeth R. Varet, as trustee of Issue Trust 5 UAD 9/28/51 FBO Sarah R. Varet, as trustee of Issue Trust 6 UAD 8/13/65 FBO Elizabeth R. Varet, as trustee of Issue Trust 6 UAD 8/13/65 FBO Nina Rosenwald and as Executrix of the Estate of Jesse L. Sigelman;

NINA ROSENWALD, individually, as trustee of the Apollo Trust for Elizabeth R. Varet UAD 2/10/69, as trustee of Issue 1 Trust UAD 8/30/41 FBO Alice Rosenwald, as trustee of Issue 1 Trust UAD 8/30/41 FBO Elizabeth R. Varet, as trustee of Issue Trust 5 UAD 9/28/51 FBO Benjamin R. Sigelman, as trustee of Issue Trust 6 UAD 8/13/65 FBO Elizabeth R. Varet, as trustee of Issue Trust 6 UAD 8/13/65 FBO Alice Rosenwald, as trustee of Issue Trust 5 UAD 9/28/51 FBO Alice Rosenwald, as trustee and beneficiary of the Apollo Trust 2/10/69 FBO Nina Rosenwald, as trustee and beneficiary of Issue 1 Trust UAD 8/30/41 FBO Nina Rosenwald, as trustee and beneficiary of Issue Trust 5 UAD 9/28/51 FBO Nina Rosenwald and as trustee and beneficiary of Issue Trust 6 UAD 8/13/65 FBO Nina Rosenwald;

IVO ROTHSCHILD;

JOSEPH A. ROSSETTI, as beneficial owner of an IRA;

BENJAMIN R. SIGELMAN, individually, as beneficiary of Issue Trust 5 UAD 9/28/51 FBO Benjamin R. Sigelman and as beneficiary of the Trust UAD 3/4/92 FBO Benjamin R. Sigelman;

JONATHAN R. SIGELMAN, individually, as beneficiary of Issue Trust 5 UAD 9/28/51 FBO Jonathan R. Sigelman and as beneficiary of the Trust UAD 3/4/92 FBO Jonathan R. Sigelman;

THE ESTATE OF JESSE L. SIGELMAN;

RONALD J. STEIN, as trustee of the Trust UAD 3/4/92 FBO Benjamin R. Sigelman and as trustee of the Trust UAD 3/4/92 FBO Jonathan R. Sigelman;

CATHERINE L. STEINMANN;

GABRIEL B. STEINMANN;

JOSHUA STEINMANN;

JENNIFER E. STEINMANN;

DAVID R. VARET;

JOSEPH R. VARET, individually, as beneficiary and  
as trustee of the Issue Trust 5 UAD 9/28/51 FBO  
Joseph R. Varet;

MICHAEL A. VARET, individually, as beneficial  
owner of one or more IRAs, as custodian for David R.  
Varet and Sara R. Varet and as trustee of the Michael  
A. Varet Trust UAD 11/9/94;

SARAH R. VARET, individually, as trustee and as  
beneficiary of Issue Trust 5 UAD 9/28/51 FBO Sarah  
R. Varet;

SUSAN C. WOLFE, as trustee of the Trust under will  
of Donald W. Parsons FBO Jane P. Klein;

ABE MASTBAUM IRA, IRA SEP and IRA  
ROLLOVER;

CHARLES D. KLEIN IRA ROLLOVER;

DAVID P. STEINMANN IRA ROLLOVER #1 and  
IRA ROLLOVER #2;

ELIZABETH R. VARET IRA ROLLOVER;  
JANE P. KLEIN IRA;  
JOYCE W. GOLDSTEIN IRA;  
LAILA HAFNER IRA;  
LAURA M. ROBERSON-FISCH IRA;  
JOSEPH A. ROSSETTI IRA ROLLOVER;  
MICHAEL A. VARET IRA ROLLOVER and IRA  
ROLLOVER #2;  
MICHAEL G. FISCH IRA;  
NEIL B. GOLDSTEIN IRA ROLLOVER;  
WALLACE APTMAN IRA ROLLOVER;  
CHARLES D. KLEIN MONEY PURCHASE

PENSION PLAN;  
DAVID STEINMANN DEFINED BENEFIT PLAN;  
DAVID P. STEINMANN MONEY PURCHASE  
PENSION PLAN;  
ELIZABETH R. VARET DEFINED BENEFIT PLAN  
& TRUST;  
ELIZABETH R. VARET MONEY PURCHASE  
PENSION PLAN;  
LAURA M. ROBERSON-FISCH MONEY  
PURCHASE PENSION PLAN;  
LAURA M. ROBERSON-FISCH PROFIT SHARING  
PLAN;  
MICHAEL G. FISCH PROFIT SHARING PLAN;  
ASB, L.L.C.;  
CDK PARTNERS;  
KLEIN FAMILY HOLDINGS, L.L.C.;  
DARMEL MANAGEMENT, L.L.C.;  
DECIMAL INVESTMENTS, L.L.C.;  
INTELLIGENT VOICE RESEARCH, L.L.C.;  
JJG ENTERPRISES;  
P&I PARTNERS;  
PTOWN POOKIES, L.L.C.;  
SOUTH LAKE, L.L.C.;  
1185 PARK AVENUE FOUNDATION, INC.;  
ALICE ROSENWALD FUND;  
AMERICAN PHILANTHROPIC FOUNDATION;  
ANCHORAGE CHARITABLE FUND;  
HUDSON CHARITABLE FUND;  
JJG FOUNDATION, INC.;  
METROPOLITAN PHILANTHROPIC FUND, INC.;  
THE ABSTRACTION FUND;  
THE CHARLES AND JANE KLEIN FAMILY FUND;  
THE REED L. HARMAN AND NAN M. HARMAN  
FOUNDATION;  
WILLIAM ROSENWALD FAMILY FUND, INC.;  
Defendants.